

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

**John & Jane Doe,**

Plaintiffs;

v.

Case No. 1:16-cv-00225-PB

**St. Paul's School**

Defendant.

**AFFIDAVIT OF JOHN DOE**

I, John Doe, solemnly swear and affirm as follows:

1. I am over the age of 18 and competent to testify to the matters contained herein based on my personal knowledge.

2. I am one of the named plaintiffs in this action and am the father of the child-victim of the sexual assault, referenced in the complaint as J.D.

3. I attended the majority of pretrial proceedings in the case of *State of New Hampshire v. Owen Labrie*, Merrimack County Superior Court Case No. 217-2014-CR-617.

4. I personally observed Michael Delaney, Esquire, attending many of the pretrial proceedings. Mr. Delaney was introduced to me as being present “on behalf of St. Paul’s School.”

5. I attended every day of the criminal trial of Owen Labrie in the above-captioned case.

6. I personally observed Mr. Delaney attending the trial regularly.

7. I was introduced to Mr. Delaney’s “witness coordinator,” Sandra Matheson, who was also present at the trial regularly.

8. During the portion of the trial in which former St. Paul School students were

slated to testify, I personally observed Mr. Delaney, Ms. Matheson and others meeting with: Andrew Thomson, Tucker Marchese, and Malcolm Salovaara. The meeting occurred before any of the witnesses testified and the meeting was being conducted in a designated witness room on the first floor of the courthouse where the criminal trial was being held.

9. I reviewed a May 6, 2016 story in THE BOSTON GLOBE regarding a survey on sexual assault conducted at various private schools, including the St. Paul's School. The link to the story, which I last reviewed on August 24, 2016, is: <http://www.bostonglobe.com/metro/2016/05/06/private-schools-painful-secrets/OaRI9PFpRnCTJxCzko5hkN/story.html>.

10. That story links to correspondence between the newspaper and the schools regarding the survey. Included with those documents is an undated email apparently sent to THE BOSTON GLOBE inadvertently by Sarah Aldag, director of communications for St. Paul's School. <https://www.documentcloud.org/documents/2825288-Survey-Answers.html> at 10-11. The message was directed to "Michael, Michael, Jeffery, me." The top line of the message says: "Hi Mike, Here is a draft of the e-mail Jeff and I worked on to send in response to the Globe's second request for participation in the survey. We want to be polite but don't want to add anything new to the conversation, and we want to make sure that the reporters are aware of the information we have already made available. The thought is to have this e-mail come from me as the SPS director of communications. If this looks right to you, I'll plan to send tomorrow using hyperlinks to the web pages mentioned in the third paragraph. We look forward to your thoughts. Sarah."

11. Upon further research, I was able to determine that the email message was sent to Michael Delaney, Esquire and was copied to Jeffrey Taufield, Vice Chairman of KEKST, a Madison Avenue based strategic communications firm.

12. Rector Michael Hirschfeld personally informed me that Paul Kigawa was the Slaymaker to whom Owen Labrie “passed down” the keys to various secluded locations on campus, including the keys to the room in which my daughter was raped. Hirschfeld informed me that the Kigawa turned the keys into him after Hirschfeld sent the students a memorandum indicating that any student in possession of stolen keys would face expulsion.

I do solemnly declare and affirm under penalty of perjury that the information set forth herein is correct to the best of my knowledge, information, and belief.

/s/ John Doe

John Doe

STATE OF MARYLAND  
COUNTY OF BALTIMORE

Signed and sworn to before me on the 25th day of August, 2016 by John Doe.

/s/ Desirena J. Farmer

Desirena J. Farmer, Notary Public

My commission expires: 10/31/2017